

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,
Plaintiff,
v.
ANITA L. STEBURG,
Respondent.

Case No. 25-cv-02092-KAW

**ORDER TO SHOW CAUSE WHY
INTERNAL REVENUE SERVICE
SUMMONSES SHOULD NOT BE
ENFORCED**

Good cause having been shown by Petitioner UNITED STATES OF AMERICA upon its petition filed in the above-entitled proceeding, it is hereby:

ORDERED that Respondent ANITA L. STEBURG appear before this Court on **June 5, 2025** at **1:30 p.m.** in the United States District Court, 1301 Clay Street, Oakland, California, and then and there show cause, if any, why Respondent should not be compelled to appear and provide documents and testimony as required by the summons heretofore served upon Respondent as alleged and set forth in particular in said petition; and it is further:

ORDERED that a copy of this Order to Show Cause, together with a copy of the aforesaid petition, be served upon said Respondent in accordance with Federal Rule of Civil Procedure 4 at on or before **April 10, 2025**; and it is further:

ORDERED that on or before **May 1, 2025**, Respondent may file and serve a written response to the petition, supported by appropriate affidavit(s) or declaration(s) in conformance with 28 U.S.C. § 1746, as well as any motion Respondent desires to make. Petitioner may file and serve a written reply to such response, if any, by **May 15, 2025**. Notwithstanding, by **May 15, 2025**, Petitioner shall file a proposed order inclusive of all relief sought by way of the petition.

All motions and issues raised by the pleadings will be considered, and only those issues

1 raised by motion or brought into controversy by the responsive pleadings and supported by
2 affidavit(s) or declaration(s) will be considered. Respondent is advised that any uncontested
3 allegation in the petition will be considered admitted. *See Foster v. Adam & Assocs., Inc.*, Case
4 No. 18-cv-2723-JSC, 2020 WL 3639648, at *3 n.3 (N.D. Cal. July 6, 2020) (citing *Booth v.*
5 *United States*, 914 F.3d 1199, 1206 (9th Cir. 2019)) (declining to consider argument raised for the
6 first time during oral argument); *Sloan v. Gen. Motors LLC*, Case No. 16-cv-7244-EMC, 2020 WL
7 5517244, at *5 (N.D. Cal. Sept. 14, 2020) (arguments made for first time at hearing were waived).

8 IT IS SO ORDERED.

9 Dated: March 13, 2025


10 KANDIS A. WESTMORE
11 United States Magistrate Judge

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